



November 17, 1999

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notification – WT Docket No. 99-168

Dear Ms. Salas:

On November 16, 1999, Motorola representatives Merle Gilmore, Mike Kennedy and Rich Barth and Tyrone Brown of Wiley, Rein & Fielding met with Chairman William E. Kennard's Legal Advisor Ari Fitzgerald and Chief of Staff Kathy Brown.

Motorola presented its band plan for spectrum at 746-806 MHz (see attachment) and advocated for an allocation to PMRS of 6 MHz of spectrum and an allocation to CMRS of 30 MHz of spectrum. Motorola highlighted its views that:

- Public Safety spectrum in this band required protection from interference.
- PMRS has a long history of protecting public safety from interference via frequency coordination.
- There are economies of scale that accrue to public safety by having nearly identical technologies in the adjacent spectrum; and
- The 2 x 15 MHz of spectrum for CMRS use is optimal for a variety of services.

Motorola indicated that there is not yet industry consensus on how to allocate the 2 x 15 MHz CMRS blocks of spectrum, but that it is actively seeking such consensus.

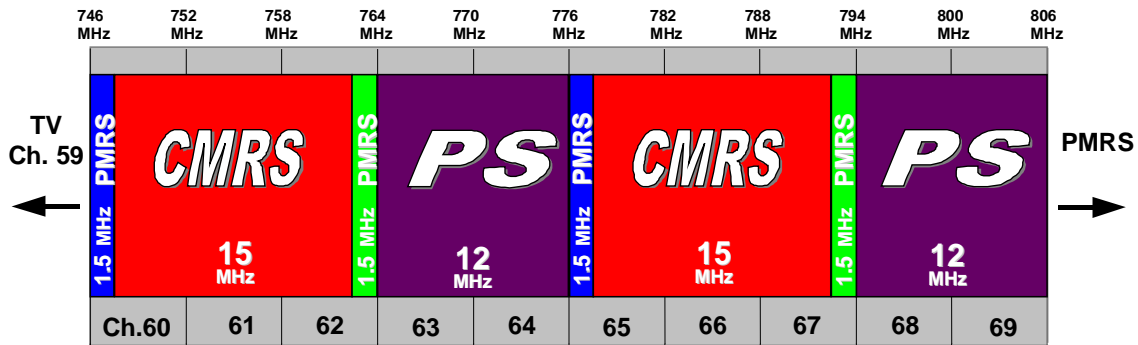
Sincerely,

Richard C. Barth, Ph.D.
Vice President and Director, Telecommunications Strategy and Regulation
Motorola, Inc.

Attachment

C: Ari Fitzgerald
Kathy Brown

Band Plan



- 6 MHz allocated for private auctioned (PMRS), in two blocks of 1.5 + 1.5 MHz with band managers
- 30 MHz for Commercial Carriers (CMRS); 15+15 MHz.
- 24 MHz for public safety (allocation completed)